

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

LINDA MOORE-SINGELTON	:	No. 15-19006-elf
Debtor,	:	
	:	CHAPTER 13
UPPER DARBY BELL TELCO FEDERAL	:	
CREDIT UNION	:	
MOVANT,	:	
	:	
v.	:	
	:	
LINDA MOORE-SINGELTON	:	
Debtor.	:	

CERTIFICATION OF DEFAULT

1. I, M. Jacqueline Larkin, attorney for Upper Darby Bell Telco Federal Credit Union (hereinafter “Movant”), hereby certify that Debtor has defaulted upon the terms of the Stipulation, filed with the Court on May 2, 2016.

2. It is further certified that Notice of said Default was mailed to Debtor and Debtor’s attorney on or about February 13, 2018. (Please see Notice of Default attached hereto as Exhibit “A”). Debtor has failed to cure the default as set forth in detail in the notice dated February 13, 2018.

3. Pursuant to the foregoing, Movant contends that cause exists to grant it relief from the Automatic Stay.

4. WHEREFORE, Movant respectfully requests that the Court enter an Order which grants it relief from the Automatic Stay, along with other relief the Court deems just and equitable.

MCGIVNEY, KLUGER & COOK, P.C.

Dated: March 6, 2018



M. Jacqueline Larkin, Esquire
Attorney for Movant